

George Haines, Esq.
 Nevada Bar No. 9411
 Gerardo Avalos, Esq.
 Nevada Bar No. 15171
FREEDOM LAW FIRM, LLC
 8985 South Eastern Ave., Suite 100
 Las Vegas, NV 89123
 Phone: (702) 880-5554
 FAX: (702) 385-5518
 Email: info@freedomlegalteam.com
Attorneys for Plaintiff William Florence

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

William Florence,
 Plaintiff,

v.

PlusFour, Inc.,
 Defendant.

Case No.: 2:22-cv-01716-GMN-VCF

**Stipulation and ~~[Proposed]~~ Order to Extend
 Discovery
 (First Request)**

William Florence (“Plaintiff”) and PlusFour, Inc. (“Defendant”), by and through their respective counsel of record, hereby submit this Stipulation and [Proposed] Order to Extend Discovery. This Stipulation is made and based upon Local Rules IA 6-1 and LR 26-3.

The parties respectfully seek a sixty (60) day extension to the remaining deadlines in the current discovery plan and scheduling order [ECF No. 9], as the parties are attempting to resolve this case via settlement and the parties’ respective resources would be better served by continuing to explore the potential resolution of this case. Accordingly, the parties respectfully request this extension in an attempt to facilitate a potential settlement of this case.

A. Current Discovery Schedule:

- | | | |
|----|------------------------|--------------|
| 1. | Discovery Cutoff Date: | May 3, 2023 |
| 2. | Dispositive Motions: | June 2, 2023 |
| 3. | Joint Pretrial Order: | July 3, 2023 |

B. Proposed Schedule:

The parties propose the following schedule:

- | | | |
|----|------------------------|-----------------|
| 1. | Discovery Cutoff Date: | July 2, 2023 |
| 2. | Dispositive Motions: | August 1, 2023 |
| 3. | Joint Pretrial Order: | August 31, 2023 |

C. Statement of Discovery Completed:

The parties have completed the following discovery:

- The parties have made their respective Rule 26 disclosures of witnesses and documents.
- Written discovery requests from Plaintiff to Defendant.
- Written discovery requests from Defendant to Plaintiff.

D. Discovery that Remains to be Completed:

In the event the parties are unable to reach a settlement agreement, the parties anticipate the following remaining discovery:

- The Rule 30(b)(6) deposition of Defendant.
- Plaintiff's deposition.

E. Reasons for the Requested Extension and Statement of Good Cause:

The parties respectfully submit that this request for a short extension is supported by good cause, as the parties are exploring potential settlement and resolution of this case. The requested extension will allow the parties to continue their efforts to reach a settlement without incurring further discovery and deposition related fees and costs.

The parties respectfully submit that the increased fees and costs associated with further discovery and depositions would present a significant obstacle to the parties' settlement negotiations. Accordingly, the requested extension is supported by good cause, and is made in good faith and not intended to delay these proceedings unnecessarily.

DATED: May 3, 2023.

FREEDOM LAW FIRM

VC2 Law

BY: /s/ Gerardo Avalos
Gerardo Avalos, Esq.
8985 South Eastern Ave., Suite 100
Las Vegas, Nevada 89123
Counsel for Plaintiff

BY: /s/ Garrett R. Chase
Garrett R. Chase, Esq.
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Counsel for Defendant

ORDER

GOOD CAUSE SHOWN, IT IS HEREBY ORDERED that the discovery scheduling order is modified as follows:

- | | | |
|----|------------------------|-----------------|
| 1. | Discovery Cutoff Date: | July 2, 2023 |
| 2. | Dispositive Motions: | August 1, 2023 |
| 3. | Joint Pretrial Order: | August 31, 2023 |

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.



UNITED STATES MAGISTRATE JUDGE

DATED: 5-4-2023